

EDA REACH Roadmap 2018 - 2020

TASK NAME	2017			2018												2019												2020											
	1	2	3	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12
1. EDA ROLE IN REACH DEFENCE MATTERS (including Study Proposal 9.3.7)																																							
(a) EDA REACH Plenary meetings with Member States (MS), covering all REACH Activities - Workpackages.																																							
(b) EDA REACH Task Force: Administration of work, covering specific REACH Workpackages at technical level.																																							
(c) Interact with the European Commission (EC).																																							
(d) Interact with the European Chemicals Agency (ECHA).																																							
(e) Interact with the European Space Agency (ESA).																																							
(f) Interact with Defence Industry.																																							
(g) EDA NAD Steering Board 21 Feb 2019 (way ahead for REACH Roadmap)																																							
(1) Conduct an assessment of the overall progress of implementation of the EDA REACH Roadmap 2018-2020 activities																																							
(2) Prepare a report, based on the assessment, including also potential follow-up EDA REACH activities for 2021 – 2023 (to be submitted to the EDA SB by early 2021)																																							
2. R&D FUNDING SCHEMES FOR INNOVATIVE SUBSTITUTION (Study proposal 9.1.1)																																							
(a) Interact with EDA internal stakeholders responsible for EU-level R&T&D funding mechanisms (e.g. ESIF, EDIDP, EDF), providing input on REACH-specific considerations, as necessary.																																							
(b) Monitor evolution of discussions between EC, EDA and MS on EU R&T&D funding mechanisms (e.g. ESIF, EDIDP, EDF). Explore possibilities for/promote R&D funding of REACH-related topics under EU R&T&D funding mechanisms/work-programmes.																																							
3. COLLABORATIVE R&T (Study Proposal 9.1.2)																																							
(a) Liaise closely with EDA R&T communities (mainly CapTechs) on REACH considerations, in general, and promote enhanced collaborative R&T projects for innovative substitution of SVHCs, in particular.																																							
(b) EDA R&T Steering Board 12 December 2018 (tasked EDA to pursue, in cooperation with pMS, the implementation of collaborative innovative R&T activities to mitigate, and if possible minimise the impact of REACH in the defence sector.)																																							
(c) Liaise with EDA R&T communities (CapTechs MaS, Components and Ammo) for further implementation of the SB tasking																																							
4. EC REACH REFIT 2017 OUTCOME AND RELATED WAY-AHEAD FOR DEFENCE																																							
(a) Monitor progress of EC's REACH Refit 2017 process and engage with EC in view of maximising the uptake of the EDA study related proposals and supporting their implementation																																							
(b) Analyse the EC REACH Refit 2017 Outcome (Final Report published 5 March 2018) vs. EDA REACH Study recommendations																																							
(c) Identify potential further actions/measures to support MS in minimising impact of REACH on Defence																																							
(d) EDA NAD Steering Board 21 Feb 2019 (noted the analysis of the EC REACH Review with respect to the EDA REACH Study recommendations previously submitted to the European Commission, and endorsed the way ahead)																																							
(e) Prioritise/Plan/Implement actions identified under (c) and endorsed under (d) above, namely in the following 4 areas, taking also industry's input into account, as necessary: (1) Clarify REACH links with other EU laws and policies * Circular Economy: refer to activity No. 12a below * Critical Raw Materials Policy (CRM): refer to activity No. 12b below (2) Simplified Applications for Authorisation (AFA) specific case: refer to activity No. 13c below (3) REACH Art. 33 Revision: refer to activity No. 11 below (4) EC REACH/CLP single web hub																																							
5. ENGAGE WITH ECHA ON THE IMPLEMENTATION OF THE FOLLOWING EDA STUDY PROPOSALS (addressed to ECHA):																																							
- Substance Tracking Tool (Study Proposal 9.4.2)																																							
- Authorisation Exemption Guidance (Study Proposal 9.4.4)																																							
(a) 21st REACH Task Force meeting 13-14 May 19; Decision to close issue - no further actions required;																																							
6. EDA CODE OF CONDUCT ON REACH (including Study Proposals 9.3.6 and 9.5.7)																																							
(a) Harmonization of REACH Defence Exemptions																																							
(1) Conduct a mapping of current status of defence exemption procedures at national level																																							
(2) Monitor progress of harmonisation/EDA CoC implementation at national level																																							
(3) Maintain/Update EDA REACH Portal on the basis of inputs from Member States																																							
(b) Promotion / implementation of reciprocal acknowledgement of REACH defence exemption decisions, among MS																																							
(1) Monitor MS actions on incorporating reciprocal acknowledgement provisions on their national REACH defence exemptions procedures, and provide support to MS, if requested.																																							
(2) Share/disseminate MS best practices on reciprocal acknowledgement of REACH defence exemptions																																							
(3) Mapping of MS provisions on reciprocal acknowledgement of national REACH defence exemptions																																							
(a) MS to provide input on provisions concerning reciprocal acknowledgement of REACH defence exemptions of other MS, within their national procedures																																							
(b) Examine the input provided by MS																																							
(4) 21st REACH Task Force meeting 13-14 May 19; Mapping is concluded - henceforth focus on activities 6(b)(1) and (2) above																																							
(c) Transparency of REACH Art. 2(3) Procedures and Decisions (Study Proposal 9.5.1)																																							
(1) Internal Transparency between MS) Preparatory phase, gathering initial inputs/proposals from TF																																							
(2) Internal Transparency between MS) Define/agree on the level of information to be disclosed on defence exemption decisions, at TF level																																							
(3) Internal Transparency between MS) Approve technical level proposal, at MS level																																							
(4) Internal Transparency between MS) Implement / liaise with MS to provide the agreed information on the defence exemptions granted so far - analyse pMS approaches (especially when same substances have been exempted)																																							
(5) External Transparency towards external stakeholders) Define/agree on information (subset of information agreed under internal transparency) that may be disclosed also to external stakeholders (publicly)																																							
(6) External Transparency towards external stakeholders) Approve technical level proposal, at MS level																																							
(7) External Transparency towards external stakeholders) Implement / liaise with MS to provide the agreed information on the defence exemptions granted so far - analyse pMS approaches (especially when same substances have been exempted)																																							
(d) Evolutions of EDA CoC on REACH																																							
(1) Legal clarification of Art. 2(3) whether exemptions granted by individual MS "in the interest" of defence apply automatically in other EU MS (Study Proposal 9.3.6)																																							
(a) Development and circulation of written proposal by DE (not submitted eventually)																																							
(b) Examination of issue at a national level by MS																																							
(c) Examination of the issue at EDA level on the basis of MS' feedback																																							
(d) 11th REACH Plenary meeting 22 November 2018; Decision to close issue and considered the sub-task as completed; focus actions henceforth on promotion of Reciprocal Acknowledgment (sub-task (b) under CoC)																																							
(2) Harmonised approach on CLP defence exemptions (incl. Study Proposal 9.5.7)																																							
(a) Investigate possible options (e.g. new CoC, updated existing CoC)																																							
(b) Identify common technical requirements for applying CLP Defence Exemptions																																							
(e) EU-Transnational Use of REACH / Joint Defence Exemptions / Complex CoC Scenarios (incl. in Study Proposals 9.3.6 and 9.5.7)																																							
(1) Establish a cooperative REACH defence exemptions' mechanism for transnational use of EDA REACH CoC																																							
(a) Develop and distribute to EDA REACH TF a related proposal, building on similar / existing EDA mechanisms (e.g. Ad Hoc Cat A and B programmes for R&D)																																							
(b) Examine and finalise potential mechanism																																							
(c) 10th REACH Plenary meeting 13-14 June 2018; Decision to stop work and re-commence at a later stage (Nov 2019); focus actions on promotion of Reciprocal Acknowledgment (sub-task (b) under CoC)																																							
(2) Approval and dissemination of mechanism to stakeholders																																							
7. AMMUNITION CLASSIFICATION UNDER REACH (including Study Proposal 9.5.5)																																							
(a) Ammunition Classification Stage 1 (Adoption of EDA MS Common Position on Ammunition Classification)																																							
(b) Assessment of Feedback from Stakeholders on Ammunition Classification Stage 1 Outcome (EDA MS Common Position on Ammunition Classification)																																							
(c) Ammunition Classification Stage 2 (incorporate Stage 1 feedback from stakeholders, work on the 9 categories not finalised)																																							
8. EU-LEVEL CLARIFICATION - ARE MoDs / ARMED FORCES REACH ADDRESSEES? (Study Proposal 9.3.5)																																							
(a) Liaise with DG GROW to monitor the relevant progress of the CION legal services on the matter																																							
(b) CION Letter to EDA on the subject																																							
(c) Communicate the outcome of the CION legal position to MS																																							
(d) Examination of CION position by MS at national level																																							
(e) MS feedback to EDA/discussion at EDA level on MS positions																																							
9. ALIGN PROCUREMENT CONTRACT TERMS WITH REACH (Study Proposal 9.5.3)																																							
(a) Gather REACH-related national procurement practices																																							
(b) Liaise with industry on supply chain best practices																																							
(c) Prepare a proposal for an EDA sector-level recommendation on REACH related procurement requirements																																							
(d) EDA NAD Steering Board 21 Feb 2019 (encouraged Member States to take further actions at national level to harmonise procurement contracts with REACH, on the basis of the related EDA recommendations)																																							
(e) Dissemination of the approved EDA recommendations on REACH related procurement requirements																																							
(f) EDA to monitor implementation of the EDA sector-level guidance by Member States at national level, taking also industry's input into account, as necessary.																																							
(1) Conduct an initial mapping on degree of MS procedures' alignment to EDA Recommendations (June 2019 – June 2020).																																							
(2) Seek periodic feedback on any changes/improvement (for those MS that mapping will show not fully aligned)																																							
10. AMMUNITION CLP LABELLING (Study Proposal 9.5.6)																																							
(a) Review ASD paper of 09-5-2016																																							
(b) Gather Member States' inputs on national CLP labelling practices																																							
(c) Prepare a proposal for EDA recommendations on ammunition CLP labelling requirements with respect to REACH																																							
(d) Approval and dissemination of the EDA sector-level guidance on ammunition CLP labelling																																							
(e) EDA to monitor implementation of the EDA sector-level guidance by Member States at national level, taking also industry's input into account, as necessary.																																							
11. REACH Art. 33 IMPLEMENTATION																																							
(a) Common Approach (Study proposal 9.3.3)																																							
(1) Disseminate the ASD "Sectoral Guidance for Substances in Articles under REACH" to EDA REACH TF																																							
(2) Review the ASD "Sectoral Guidance for Substances in Articles under REACH" - provide feedback to ASD and identify potential actions for EDA/MS																																							
(3) Work towards a harmonised practical implementation of REACH Article 33 by MS																																							
(4) Monitor further developments in interactions/exchange between the Commission, ECHA and industry on the implementation of the REACH Art. 33 requirements, so as to take into account in further work on this activity																																							
(b) Waste Directive / ECHA Database																																							
(1) Monitor the evolution of the updated Waste Directive / ECHA Database issue and identify potential actions for EDA/MS																																							
(c) REACH Art. 33 Legal Text Revision (Study Proposal 9.3.4)																																							
(1) Potential implementation in the future, under the next REACH review in 2022 (if eventually needed and if legal text will be opened at the time)																																							
12. CLARIFY REACH LINKS WITH OTHER EU LAWS AND POLICIES (Study Proposal 9.2.3)																																							
(a) REACH and Circular Economy																																							
(1) Monitor REACH/Circular Economy related developments at EU level, in view so as to take into account in further work on this activity																																							
(2) Upon release of the EDA Circular Economy Study, examine its outcome with respect to REACH, identifying need for potential future actions																																							
(b) REACH and Critical Raw Materials (CRM)																																							
(1) Further explore links/interface between REACH and CRM;																																							
(c) Study on Consistency of EU Chemicals' / Products' Laws Impacting Defence (Study Proposal 9.2.2)																																							
(1) Preparation of the tender specifications																																							
(2) Launch tender - award contract - implement Study																																							
13. APPLICATIONS FOR AUTHORISATION (AFAs)																																							
(a) Substance Specific Applications for Authorisation (AFAs)																																							
(1) Monitor evolutions for critical substance-specific (e.g. CrO3) AFAs at EU level and raise awareness of defence related impact																																							
(b) Fit-for-Purpose (F4P) Military Applications for Authorisation (AFAs) (Study Proposal 9.3.1)																																							
(1) Liaise with ECHA																																							
(2) Liaise with industry																																							
(3) Development of a military AFA guidance document (if required based on developments)																																							
(c) Simplified Applications for Authorisation (AFA) specific cases																																							
(1) Review the final outcome/potential EC approval of the simplified authorisation processes e.g. legacy spare parts, low volume applications (as soon as it will become available)																																							



2022